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REMARKS

This Application has been carefully reviewed in light of the final Office Action mailed April 19, 2004. Applicants appreciate the Examiner's consideration of the Application. Claims 1, 3, 10, 15-17, and 23 have been amended to clarify, more particularly point out, and more distinctly claim inventive concepts previously present in these claims. These amendments are not considered necessary for patentability. Applicants respectfully submit that no new matter has been added by the amendments to the claims. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

Section 112 Rejection

Applicants respectfully submit that the specification clearly sets forth the claimed invention. The example embodiment described with reference to Figure 7 shows a memory unit that includes modules operable to perform the operations of the one embodiment of the invention. Accordingly, the claims particularly point out and distinctly claim the subject matter the Applicants regard as the invention, and thus are allowable under 35 U.S.C. § 112.

Section 103(a) Rejection

The Claims are allowable over the *Reese-Engbersen-Kaufman* combination

The Examiner rejects Claims 1-10 and 12-32 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,374,237 to Reese ("*Reese*") in light of U.S. Patent No. 6,341,304 to Engbersen et al. ("*Engbersen*") and U.S. Patent No. 6,654,367 to Kaufman ("*Kaufman*"). Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that the *Reese-Engbersen-Kaufman* combination suggested by the Examiner fails to disclose, teach, or suggest elements specifically recited in Applicants' claims. For example, *Reese-Engbersen-Kaufman* combination fails to disclose, teach, or suggest the following combination of elements specifically recited in Applicants' claims:

(1)   modules operable to "initiate voice communication to the second station," and "play the information stored at the first station in response to initiating the voice communication to the second station"; and

(2)   modules operable to "determine whether a request for additional information has been received," "connect the first station to a third station associated with the information, if a request for additional information has been received," and "connect the first station to the second station, otherwise" (recited in independent Claim 1, as amended).

Reese discloses a "method and a system for requesting and retrieving information from distinct web network content sites." (*Reese*, column 1, lines 55-57.) According to *Reese*:

> The system of the invention includes a client adapted to send a request that contains a user profile, and a server adapted to retrieve a first set of pre-determine [*sic*] data. Upon receiving the request from the client, the server is adapted to retrieve a second set of data from the first set of data that substantially matches the request and deliver the second set of data to the client.

(*Reese*, column 1, line 64--column 2, line 3.) That is, the server of *Reese* retrieves data in response to a client request, not in response to initiating a call. Accordingly, *Reese* fails to disclose, teach, or suggest modules operable to "initiate voice communication to the second station," and "play the information stored at the first station in response to initiating the voice communication to the second station," as recited by independent Claim 1. Moreover, *Reese* deals with retrieval of web content, and fails to disclose, teach, or suggest modules operable to "determine whether a request for additional information has been received," "connect the first station to a third station associated with the information, if a request for additional information has been received," and "connect the first station to the second station, otherwise," as recited by independent Claim 1.

Engbersen discloses a method and a system in which "network site and/or data requests are kept track of in terms of the number of times the same data or site request is presented." (*Engbersen*, column 1, lines 44-47.) *Engbersen* discloses:

> In one example, when the request frequency for any particular data file reaches a predetermined number, or when a frequently requested data file is sufficiently large as to significantly impact the network bandwidth, the data file requested is marked for download during off-peak hours to a local non-volatile storage device such that subsequent user requests for that data item may be serviced directly from a local server or local storage device more proximate to the requesting user, thereby reducing overall bandwidth use for frequently requested data.

(*Engbersen*, column 1, lines 47-56.) That is, the system of *Engbersen* provides a data item in response to a user request, not in response to initiating a call. Accordingly, *Engbersen* fails to disclose, teach, or suggest modules operable to "initiate voice communication to the second station," and "play the information stored at the first station in response to initiating the voice communication to the second station," as recited by independent Claim 1. Moreover, *Engbersen* deals with data retrieval from a server, and fails to disclose, teach, or suggest modules operable to "determine whether a request for additional information has been received," "connect the first station to a third station associated with the information, if a request for additional information has been received," and "connect the first station to the second station, otherwise," as recited by independent Claim 1.

Kaufman discloses an Internet radio. (*Kaufman*, column 6, lines 41-43.) According to *Kaufman*, "The channel selector module 200 allows a user to select from among a plurality of possible audio information sources from various content providers on the Internet." (*Kaufman*, column 3, lines 38-41.) *Kaufman* also discloses:

> Based on the channel selected in the channel selector module 200, the Internet audio appliance 100 automatically dials the IP server 102 (FIG. 1) or other Internet access port, and requests from the selected content provider 512 an audio information data stream corresponding to a desired subject, language, or other information.

(*Kaufman*, column 4, lines 2-7.) That is, the data stream is played in response to a channel selection, not in response to initiating a call. Accordingly, *Kaufman* fails to disclose, teach, or suggest modules operable to "initiate voice communication to the second station," and "play the information stored at the first station in response to initiating the voice communication to the second station," as recited by independent Claim 1. Moreover, *Kaufman* discloses an Internet radio, but fails to disclose, teach, or suggest modules operable to "determine whether a request for additional information has been received," "connect the first station to a third station associated with the information, if a request for additional information has been received," and "connect the first station to the second station, otherwise," as recited by independent Claim 1.

Consequently, at a minimum, the *Reese-Engbersen-Kaufman* combination suggested by the Examiner fails to disclose, teach, or suggest the modules as described in independent

Claim 1. For at least these reasons, the *Reese-Engbersen-Kaufman* combination fails to disclose the elements specifically recited in Applicants' independent Claim 1.

Applicants' dependent claims are allowable based on their dependence on the independent claim and further because they recite numerous additional patentable distinctions over the references of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claim over the references of the rejection, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Independent Claims 15 and 23 recite certain limitations substantially similar to those recited in independent Claim 1. Accordingly, for at least the same reasons, Applicants also respectfully request reconsideration and allowance of independent Claims 15 and 23, together with their dependent claims.

The Claims are allowable over the *Sassin-Engbersen-Kaufman* combination

The Examiner rejects Claims 1-6, 11, 15, 16, 18-25, and 30 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,249,576 to Sassin et al. (*"Sassin"*) in light of *Engbersen* and *Kaufman*. Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that *Sassin-Engbersen-Kaufman* combination suggested by the Examiner fails to disclose, teach, or suggest the modules as described in independent Claim 1. As discussed above, *Engbersen* and *Kaufman* fail to disclose, teach, or suggest the modules as described in independent Claim 1.

Moreover, *Sassin* fails to disclose, teach, or suggest the modules as described in independent Claim 1. *Sassin* discloses "a method and system for providing telephone directory information." (*Sassin*, column 1, lines 6-7). According to *Sassin*, "The computer 16 is connected to a second telephone 18 and is configured to dial telephone numbers to set up calls for the second telephone." (*Sassin*, column 3, lines 38-40). *Sassin* also discloses:

> The text of the telephone numbers representing the search results are highlighted, and the user selects the telephone number of the called party by clicking on the text of the called party's telephone number. Selection of a

telephone number causes the computer 16 to transmit an establish-connection request signal to the server 10.

(*Sassin*, column 7, lines 34-40). In response to receiving the establish-connection request signal, the server establishes a connection between the first telephone and the second telephone. (*Sassin*, column 7, lines 50-62). That is, *Sassin* discloses displaying the text of telephone numbers in response to a search request, but not the playing of audio information in response to initiating a call. Accordingly, *Sassin* fails to disclose, teach, or suggest modules operable to "initiate voice communication to the second station," and "play the information stored at the first station in response to initiating the voice communication to the second station," as recited by independent Claim 1. Furthermore, *Sassin* discloses establishing a connection in response to an establish-connection request signal, but fails to disclose, teach, or suggest modules operable to "determine whether a request for additional information has been received," "connect the first station to a third station associated with the information, if a request for additional information has been received," and "connect the first station to the second station, otherwise," as recited by independent Claim 1.

Accordingly, the *Sassin-Engbersen-Kaufman* combination suggested by the Examiner fails to disclose, teach, or suggest the modules as described in independent Claim 1.

Applicants' dependent claims are allowable based on their dependence on the independent claim and further because they recite numerous additional patentable distinctions over the references of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claim over the references of the rejection, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Independent Claims 15 and 23 recite certain limitations substantially similar to those recited in independent Claim 1. Accordingly, for at least the same reasons, Applicants also respectfully request reconsideration and allowance of independent Claims 15 and 23, together with their dependent claims.

The Claims are allowable over the *Jawahar-Engbersen-Kaufman* combination

The Examiner rejects Claims 1, 3, 11, 15, 16, 18-20, 22, and 25-29 under 35 U.S.C. §
103(a) as being unpatentable over U.S. Patent No. 6,256,620 to Jawahar et al. (*"Jawahar"*) in
light of *Engbersen* and *Kaufman*. Applicants respectfully traverse this rejection for the
reasons discussed below.

Applicants respectfully submit that *Jawahar-Engbersen-Kaufman* combination
suggested by the Examiner fails to disclose, teach, or suggest the modules as described in
independent Claim 1. As discussed above, *Engbersen* and *Kaufman* fail to disclose, teach, or
suggest the modules as described in independent Claim 1.

Moreover, *Jawahar* fails to disclose, teach, or suggest the modules as described in
independent Claim 1. *Jawahar* discloses "a system that monitors the access of information
by an individual or system." (*Jawahar*, column 1, lines 6-8). According to *Jawahar*, "At step
170, a customer contacts a web server (e.g., web server 136) and retrieves one or more web
pages for viewing using a browser application (e.g., browser application 158)." (*Jawahar*,
column 11, lines 17-20). That is, *Jawahar* discloses displaying web pages in response to a
customer request, but not playing audio information in response to initiating a call.
Accordingly, *Jawahar* fails to disclose, teach, or suggest modules operable to "initiate voice
communication to the second station," and "play the information stored at the first station in
response to initiating the voice communication to the second station," as recited by
independent Claim 1.

Jawahar also discloses, "At step 172, the customer requests additional information
about a product or service, or requests to be contacted by an agent. (*Jawahar*, column 11,
lines 20-22). According to *Jawahar*:

> Step 180 also establishes a communication link (in this example, a telephone
> link) between the selected agent and the customer. A transaction processing
> system may be used to automatically establish the telephone link across a
> PSTN or a web server may be used to establish an Internet telephone call
> across the Internet.

(*Jawahar*, column 11, lines 59-65). According to Figures 1 and 2, the transaction processing
system and the web server are separate from the customer system. That is, the customer
system does not establish the communication link. Accordingly, *Jawahar* fails to disclose,
teach, or suggest a first device with modules operable to "determine whether a request for

additional information has been received," "connect the first station to a third station associated with the information, if a request for additional information has been received," and "connect the first station to the second station, otherwise," as recited by independent Claim 1.

Accordingly, the *Jawahar-Engbersen-Kaufman* combination suggested by the Examiner fails to disclose, teach, or suggest the modules as recited in independent Claim 1.

Applicants' dependent claims are allowable based on their dependence on the independent claim and further because they recite numerous additional patentable distinctions over the references of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claim over the references of the rejection, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Independent Claims 15 and 23 recite certain limitations substantially similar to those recited in independent Claim 1. Accordingly, for at least the same reasons, Applicants also respectfully request reconsideration and allowance of independent Claims 15 and 23, together with their dependent claims.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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